REMARKS

Applicants thank the Examiner for the careful and thorough examination of the present application. The Examiner is also thanked for properly withdrawing his prior rejections over the prior art. The patentability of the claims is discussed below.

I. The Claimed Invention

The invention is directed to a cryptographic device. Independent Claim 1, for example, recites a cryptographic device, which includes a cryptographic module and a communications module coupled thereto. More particularly, the cryptographic module includes a user network interface, a host network processor coupled to the user network interface, and a cryptographic processor coupled to the host network processor. Additionally, the communications module includes a network communications interface coupled to the cryptographic processor. The host network processor generates cryptographic processor command packets for the cryptographic processor each having an address portion and a data portion, and it also encapsulates command packets for the communications module interface in the data portions of the cryptographic processor command packets. Moreover, the cryptographic processor passes the command packets to the communications module without performing cryptographic processing thereon. The user network interface includes a

plurality of different connectors for coupling the cryptographic module to different network devices.

Independent Claim 21 is a method counterpart to independent Claim 1. Independent Claim 26 is a system counterpart to independent Claim 1 further reciting the host network processor formatting the data portions based upon the simple network management protocol. Independent Claim 36 is directed to the cryptographic module of independent Claim 1.

Independent Claim 12 is directed to a cryptographic device as recited in independent Claim 1 further reciting the user network interface as a Local Area Network (LAN) interface, the command packets as Ethernet command packets, and the host network processor formatting the data portions based upon the simple network management protocol.

II. The Claims Are Patentable

The Examiner rejected independent Claims 1, 12, 21, 26 and 36 based on a combination of Dellmo et al., Dichter, and Mitsuoka et al. Independent Claim 12 was rejected further in view of Stevens. Dellmo et al. is directed to a secure wireless LAN device including a housing, a wireless transceiver carried by the housing, and a cryptography circuit carried by the housing. A media access controller (MAC) is included and implements a predetermined wireless LAN MAC protocol. The cryptography circuit includes a cryptography processor, and a control gateway circuit connected to the MAC and the wireless

transceiver. The secure wireless LAN device also includes a user network interface carried by the housing and connected to the MAC.

The Examiner correctly recognized that Dellmo et al. does not disclose the user network interface comprising a plurality of different connectors for coupling the cryptographic module to different network devices. The Examiner also correctly recognized that Dellmo et al. fails to disclose the host network processor generating cryptographic processor command packets for the cryptographic processor each having an address portion and a data portion, and encapsulating command packets for the communications module interface in the data portions of the cryptographic processor command packets. Still further, the Examiner correctly recognized that Dellmo et al. fails to disclose the cryptographic processor passing the communications module command packets to the communications module without performing cryptographic processing thereon.

The Examiner then turned to Dichter for the critical deficiency of the user network interface comprising a plurality of different connectors for coupling the cryptographic module to different network devices. Dichter is directed to a computer network including a plurality of nodes. A programmable switching network allows the nodes to be connected in a plurality of different ways, for example, to selectively allow a node to be connected either as a pass through node or a non-pass

through node, and to connect nodes to one another via telephone lines.

The Examiner correctly recognized that even a selective combination of Dellmo et al. and Dichter fails to disclose the host network processor generating cryptographic processor command packets for the cryptographic processor each having an address portion and a data portion, and encapsulating command packets for the communications module interface in the data portions of the cryptographic processor command packets, and the cryptographic processor passing the communications module command packets to the communications module without performing cryptographic processing thereon. The Examiner turned to Mitsuoka et al. for these critical deficiencies.

Mitsuoka et al. is directed to an access control apparatus and method. More particularly, Mitsuoka et al. discloses controlling accesses to a communications network, the accesses received being based on the iSCSI protocol. A host apparatus outputs a command from its SCSI application layer. The command corresponds to a command frame including both a command and data. Upon reaching and being output from other protocol layers, the command frame is encapsulated in an information frame wherein a SCSI command packet is enclosed by an iSCSIPDU unit, a TCP packet, an IP packet, and an Ethernet head packet.

Applicants respectfully submit that Mitsuoka et al. fails to disclose cryptographic processor command packets for

the cryptographic processor each having an address portion and a data portion, and encapsulating command packets for the communications module interface in the data portions of the cryptographic processor command packets. Instead, Mitsuoka et al. discloses a command, as illustrated in FIG. 6A, that "corresponds to a command frame containing both a command and data." (See Mitsuoka et al., Col. 14, lines 50-52). Moreover, the iSCSC PDU unit that encapsulates the SCSI CMD/DATA packet includes merely address information, for example, a logical unit number (LUN) and a command descriptor block (CDB). Thus the SCSI command/data packet is encapsulated in address information, and not in the data portions of the cryptographic processor command packets. Accordingly, the independent claims are patentable for at least this reason alone.

Applicants respectfully submit Dichter fails to disclose the user network interface including a plurality of different connectors for coupling the cryptographic module to different network devices. The Examiner contends that a network hub, as disclosed in the background of Dichter, supplies the critical deficiency of Dellmo et al. As disclosed in the background of Dichter, a network hub includes "a plurality of cable connectors so that each computer on the network may be connected to the hub." (See Dichter, Col. 1, lines 32-34). The network hub, as disclosed in Dichter, fails to disclose or suggest that the connecters <u>are different</u>. In fact, Dichter discloses that the connectors of the hub <u>are all the same</u>, that

is, they are all RJ-45 connectors. (See Dichter, Col. 1, lines 49-53). Accordingly, the Examiner's combination of references fails to disclose the claimed invention, as recited in the independent claims.

As previously noted, Dellmo et al. is directed to a secure wireless LAN device. A MAC is included and implements a predetermined wireless LAN MAC protocol. The cryptography circuit includes a cryptography processor, and a control gateway circuit connected to the MAC and the wireless transceiver. The secure wireless LAN device also includes a user network interface connected to the MAC. In contrast, Mitsuoka et al. is directed to a storage control apparatus for controlling an access to a communications network in accordance with the iSCSI protocol, and wherein the access is received via the communications network. (See Mitsuoka et al., Col. 1, lines 1-19; Col. 1, line 64 - Col. 2, line 5). Indeed, Mitsuoka et al. is not related to cryptography. A person having ordinary skill in the art would not turn to the iSCSI protocol communications network access system disclosed in Mitsuoka et al. to generate, process, and pass packets from the internal processors and modules on an ESP independent cryptographic device in Dellmo et al. Accordingly, the combination of Dellmo et al. and Mitsuoka et al. is improper.

Moreover, in Mitsuoka et al., the resulting information frame, as illustrated in FIG. 6B, includes the command and/or data encapsulated in a TCP packet, an IP packet,

and Ethernet header packet. (See Mitsuoka et al., Col. 14, lines 49-67). For example, the IP packet, and Ethernet header packet includes a target IP address and target host information for a target host or switching device. (See Mitsuoka et al., Col. 12, lines 47-56, and Col. 15, lines 54-59). Implementing Mitsuoka et al. into Dellmo et al. would destroy the functionality of Dellmo et al. since the packets in Dellmo et al. are generated for passing between the cryptographic processor and the communications module internal to the device, not for controlling access the communications network from an external apparatus. (See Mitsuoka et al., Col. 1, lines 14-18).

Additionally, Applicants respectfully submit that the Examiner's combination of Dellmo et al., Dichter, and Mitsuoka et al. is improper. Applicants point out that Dellmo et al., whose primary objective is to provide greater security in a wireless LAN environment, teaches a secure wireless LAN device including a housing, a wireless transceiver carried by the housing, and a cryptography circuit carried by the housing. Conversely, Dichter discloses a configurable network that provides a specification compliant topology without requiring the rewiring of a building. A person having ordinary skill in the art would not turn to the programmably configurable computer network of Dichter to combine with the cryptographic device of Dellmo et al.

Still further, Dichter is directed to a wired computer network. As noted above, the wired configurable network of

Dichter advantageously allows the use of existing wiring in a building, mainly existing telephone lines. In stark contrast, Dellmo et al. discloses a secure wireless network device. A person having ordinary skill in the art would not combine the wired network of Dichter with the secure wireless network device of Dellmo et al., as not only does Dichter teach away from Dellmo et al, but combining the wired network of Dichter with the secure wireless device of Dellmo et al. would destroy the operability of the Dellmo et al. secure wireless device.

Moreover, one having ordinary skill in the art would not turn to Mitsuoka et al., which is directed to the case where an external apparatus wishes to access the communications network, to combine with the configurable computer network teachings of Dichter. Accordingly, the Examiner's combination of references is improper.

The Examiner also rejected independent Claim 12 over a four-way combination of Dellmo et al., Dichter, Mitsuoka et al., and Stevens. Stevens is cited as disclosing an SNMP protocol. Stevens adds nothing to the critical deficiencies of Dellmo et al., Dichter, and Mitsuoka et al.

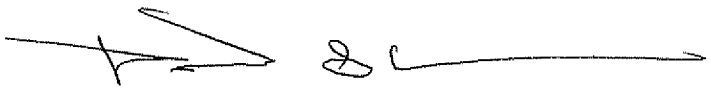
Accordingly, it is submitted that the independent claims are patentable over the prior art. In view of the patentability of the independent claims, it is submitted that their dependent claims, which recite yet further distinguishing features, are also patentable over the cited references for at

least the reasons set forth above. Accordingly, these dependent claims require no further discussion herein.

CONCLUSION

It is submitted that all of the claims are patentable. Accordingly, a Notice of Allowance is therefore respectfully requested in due course. If the Examiner determines any remaining informalities exist, he is encouraged to contact the undersigned attorney at the telephone number listed below.

Respectfully submitted,



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